

F. Christopher Austin (Nevada Bar No. 6559)
WEIDE & MILLER, LTD.
10655 Park Run Drive, Suite 100
Las Vegas, Nevada 89144
Tel: (702) 382-4804
Fax: (702) 382-4805
Email: caustin@weidemiller.com

Of Counsel:

Daniel J. Melman (*pro hac vice*)
Guy Yonay (*pro hac vice*)
**PEARL COHEN ZEDEK LATZER BARATZ
LLP**
Times Square Tower
7 Times Square
New York, NY 10036
Tel: (646) 878-0800
Fax: (646) 878-0801
Email: DMelman@pearlcohen.com
GYonay@pearlcohen.com

*Attorneys for Plaintiff and Counterclaim-
Defendant High Sec Labs Ltd.*

W. West Allen (Nevada Bar No. 5566)
HOWARD & HOWARD ATTORNEYS PLLC
3800 Howard Hughes Parkway, Suite 1000
Las Vegas, Nevada 89169
Tel: (702) 257-1483
Email: wwa@h2law.com

Of Counsel:

Ashe Puri (*pro hac vice*)
MAYNARD COOPER & GALE, LLP
1925 Century Park East, Suite 1700
Los Angeles, California 90067
Tel: (310) 596-4344
Email: apuri@maynardcooper.com

Sasha Rao (*pro hac vice*)
MAYNARD COOPER & GALE, LLP
Transamerica Pyramid Center
600 Montgomery Street, Suite 2600
San Francisco, California 94111
Tel: (415) 646-4702
Email: srao@maynardcooper.com

*Attorneys for Defendants and
Counterclaimants iPGARD Inc. and
SmartAVI Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

HIGH SEC LABS LTD.,

Plaintiff,

v.

IPGARD INC.
SMARTAVI INC.,

Defendants.

Case No.: 2:20-cv-01797-MMD-NJK

**NOTICE OF SETTLEMENT AND
STIPULATION TO STAY UPCOMING
DEADLINES BY 60 DAYS AND
ORDER**

1 PLEASE TAKE NOTICE that Plaintiff High Sec Labs Ltd. (“HSL”) and Defendants
2 iPGARD Inc. and SmartAVI Inc. (“Defendants”) (collectively, the “Parties”) have reached an
3 agreement in principle to settle this case.

4 Accordingly, the parties hereby request that the Court stay all upcoming deadlines by sixty
5 (60) days. In the light of the settlement, the parties agree that Defendants will not be submitting
6 their Markman Response Brief presently due on August 13, 2021 and that Plaintiff will not be
7 submitting its Markman Reply Brief presently due on August 20, 2021. The purpose of the stay
8 is to allow the Parties time to complete their settlement agreement, after which the Parties shall
9 file a joint stipulation to dismiss this case with prejudice or file a joint proposed amended
10 discovery plan and scheduling order.

11 IT IS SO ORDERED:

12
13 

14 HON. MIRANDA M. DU, CHIEF JUDGE

15 DATED: August 12, 2021

1 DATED: August 12, 2021

2
3 Respectfully submitted,

4 /s/ Daniel Melman

5 Daniel J. Melman (*pro hac vice*)
6 Guy Yonay (*pro hac vice*)
7 **PEARL COHEN ZEDEK LATZER BARATZ**
8 **LLP**
9 Times Square Tower
10 7 Times Square
11 New York, NY 10036
12 Tel: (646) 878-0800
13 Fax: (646) 878-0801
14 Email: DMelman@pearlcohen.com
15 GYonay@pearlcohen.com

16 F. Chris Austin (Nevada Bar No. 6559)
17 **WEIDE & MILLER, LTD.**
18 10655 Park Run Drive, Suite 100
19 Las Vegas, NV 89144
20 Tel: (702) 382-4804
21 Fax: (702) 382-4805
22 Email: caustin@weidemiller.com

23 *Attorneys for Plaintiff High Sec Labs Ltd.*

4 /s/ W. West Allen

5 Ashe Puri (*pro hac vice*)
6 **MAYNARD COOPER & GALE, LLP**
7 1925 Century Park East, Suite 1700
8 Los Angeles, California 90067
9 Tel: (310) 596-4344
10 Email: apuri@maynardcooper.com

11 Sasha Rao (*pro hac vice*)
12 **MAYNARD COOPER & GALE, LLP**
13 Transamerica Pyramid Center
14 600 Montgomery Street, Suite 2600
15 San Francisco, California 94111
16 Tel: (415) 646-4702
17 Email: srao@maynardcooper.com

18 W. West Allen (Nevada Bar No. 5566)
19 **HOWARD & HOWARD ATTORNEYS PLLC**
20 3800 Howard Hughes Parkway, Suite 1000
21 Las Vegas, Nevada 89169
22 Tel: (702) 257-1483
23 Email: wwa@h2law.com

24 *Attorneys for Defendants and Counterclaimants*
25 *iPGARD Inc. and SmartAVI Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on the date indicated below I electronically filed **NOTICE OF SETTLEMENT AND STIPULATION TO STAY UPCOMING DEADLINES BY 60 DAYS AND [PROPOSED] ORDER** using the CM/ECF system, which will send notice of such filing to all registered CM/ECF users.

DATED: August 12, 2021

/s. W. West Allen

W. West Allen